

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SIMRET SEMERE TEKLE,

Plaintiff,

v.

NOUF BINT NAYEF ABUL-AZIZ AL SAUD,
MOHAMMAD BIN ABDULLAH AL SAUD

Defendants.

Case No.: 1:18-cv-211

**PLAINTIFF SIMRET SEMERE TEKLE’S MOTION TO DISMISS
DEFENDANTS’ COUNTERCLAIM PURSUANT TO RULE 12(b)(6)**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Plaintiff Simret Semere Tekle respectfully moves to dismiss with prejudice Defendants Nouf bint Nayef Abdul-Aziz al Saud and Mohammad bin Abdullah al Saud’s counterclaim for defamation *per se* for failure to state a claim upon which relief can be granted. Dkt No. 69. A memorandum of points and authorities in support accompanies this motion.

Dated: March 8, 2019

Respectfully submitted,

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